

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

JOE ANDREW SALAZAR,

Plaintiff,

v.

AT&T MOBILITY LLC,
SPRINT/UNITED MANAGEMENT
COMPANY, T-MOBILE USA, INC.,
AND CELLCO PARTNERSHIP D/B/A
VERIZON WIRELESS,

Defendants

and

HTC CORP., and HTC AMERICA, INC.,

Intervenors.

Civil Action No. 2:20-cv-4

DEMAND FOR JURY TRIAL

JOINT MOTION FOR LEAVE TO AMEND
DOCKET CONTROL ORDER (Dkt. 125)

Pursuant to the Court’s November 20, 2020 Order (Dkt. 163), Plaintiff Joe Andrew Salazar (“Plaintiff” or “Salazar”), Defendants AT&T Mobility LLC (“AT&T Mobility”), Sprint United Management Company (“Sprint”), T-Mobile USA Inc. (“T-Mobile”), and Cellco Partnership, Inc. d/b/a Verizon Wireless, Inc. (“Verizon”) (collectively, “Defendants”) and Intervenors HTC Corporation and HTC America, Inc. (collectively, “Intervenors”) jointly move the Court to amend its governing Docket Control Order (Dkt. 125) as reflected in the attached proposed order.

Dated: December 9, 2020

Respectfully submitted,

/s/Geoff Culbertson
Geoffrey Culbertson
TX Bar No. 24045732
gpc@texarkanalaw.com
Kelly Tidwell
TX Bar No. 20020580
kbt@texarkanalaw.com
PATTON, TIDWELL &
CULBERTSON, LLP
2800 Texas Boulevard
Texarkana, Texas 75503
Telephone: 903-792-7080
Fax: 903-792-8233

Dariusz Keyhani (Lead Attorney)
District of Columbia Bar No. 1031500
(*pro hac vice*)
Frances H. Stephenson
New York registration No. 5206495
(*pro hac vice*)
Keyhani LLC
1050 30th Street NW
Washington, DC 20007
Telephone: (202) 748-8950
Fax: (202) 318-8958
dkeyhani@keyhanillc.com
fstephenson@keyhanillc.com

Attorneys for Plaintiff

/s/Fred Williams

Fred I. Williams

Texas State Bar No. 00794855

Michael Simons

Texas State Bar No. 24008042

Todd E. Landis

Texas State Bar No. 24030226

Jonathan L. Hardt

Texas State Bar No. 24039906

WILLIAMS SIMONS & LANDIS PLLC

327 Congress Ave., Suite 490

Austin, TX 78701

Tel: 512.543.1354

fwilliams@wsltrial.com

msimons@wsltrial.com

tlandis@wsltrial.com

jhardt@wsltrial.com

John Wittenzellner

Pennsylvania State Bar No. 308996

WILLIAMS SIMONS & LANDIS PLLC

1735 Market Street, Suite A #453

Philadelphia, PA 19103

Tel: 512.543.1354

johnw@wsltrial.com

Harry Lee Gillam, Jr.

State Bar No. 07921800

gil@gillamsmithlaw.com

GILLAM & SMITH, LLP

303 South Washington Avenue

Marshall, Texas 75670

Tel: 903.934.8450

Fax: 903.934.9257

Attorneys for Defendant and Intervenor

CERTIFICATE OF SERVICE

The undersigned certifies that the foregoing document was filed electronically in compliance with the Federal Rules of Civil Procedure. All other counsel of record not deemed to have consented to electronic service were served with a true and correct copy of the foregoing by U.S. Mail, CMRRR on this 9th day of December, 2020.

/s/Geoff Culbertson

Geoffrey Culbertson

CERTIFICATE OF CONFERENCE

I certify that counsel has complied with the requirements of Local Rule CV-7(h). Specifically, counsel for all parties conferred on December 4, 2020 and agreed to the deadlines in the attached proposed docket control order.

/s/Geoffrey Culbertson
Geoffrey Culbertson